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Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NEETA THAKUR, et al.,

Plaintiffs,

vs.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 3:25-cv-04737-RL

**DECLARATION OF CLAUDIA POLSKY
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION AND
PROVISIONAL CLASS CERTIFICATION
AS TO ADDITIONAL AGENCY
DEFENDANTS**

1 I, Claudia Polsky, declare as follows:

2 1. I am a Clinical Professor of Law at UC Berkeley. In my non-faculty capacity, I
3 represent plaintiffs in this matter. I have personal knowledge of the facts contained herein and, if
4 called as a witness, could and would testify competently to them.

5 2. Attached as Exhibit A is a true and correct copy of a spreadsheet I received from
6 Dr. Susan Handy on September 9, 2025. It cumulates the University of California (UC)
7 researchers who were directly or indirectly supported by U.S. Department of Transportation
8 (DOT) grants that the agency has terminated since January 20, 2025.

9 3. Attached as Exhibit B is a true and correct copy of my accompanying email
10 correspondence with Dr. Handy. In it, Dr. Handy explains that depending on which researchers are
11 counted, the number of UC researchers affected by the DOT grant terminations is either 38 or 72.
12 The larger figure includes researchers whose grants from other sources have evaporated in the
13 wake of DOT's termination of UC grants because those sources required a federal match. Thus,
14 the termination of DOT funding is the but-for cause of these researchers' loss of project funding.

15 I declare under penalty of perjury under the laws of the State of California and the United
16 States that the foregoing is true and correct.

17 Executed this 15th day of September, 2025 in Berkeley, California.

18
19 /s/ Claudia Polsky
Claudia Polsky

EXHIBIT A

US DOT Grants with UC Pis**Researchers**

Federal total	38
Match total	34

GSRs

Federal total	17
Match total	21

Student grants

Federal total	23
Match total	5

NCST - National Center for Sustainable Transportation**Federal**

	UC Davis	UC Riverside	Total
Researchers	16	2	18
GSRs	6	1	7
Student grants	0	4	4

Caltrans or Office of Research Match

	UC Davis	UC Riverside	Total
Researchers	21	3	24
GSRs	11	1	12
Student grants	5	0	5

PSR - Pacific Southwest Region University Transportation Center**Federal**

	UC Davis	UCLA	UC Irvine	UC Berkeley	UCSB	Total
Researchers	2	0	0	0	1	3
GSRs	1				1	2
Student grants	2	10		7		19

Caltrans or OR Match

	UC Davis	UCLA	UC Irvine	UC Berkeley	UCSB	Total
Researchers	3	2	3	2	0	10
GSRs	2	2	3	2		9
Student grants						0

CERRCET - Center for Emissions Reduction, Resiliency, and Community Engagement in Transportation**Federal**

	UC Davis	UC Riverside	Total
Researchers	16	1	17
GSRs	7	1	8

EXHIBIT B

RE: Q about DOT researchers in UC system impacted by grant terminations

From: Susan L Handy (slhandy@ucdavis.edu)

To: polskymmermin@sbcglobal.net

Date: Tuesday, September 9, 2025 at 09:21 PM PDT

A total of 72 researchers, including post-docs.

Graduate Student Researchers (PhD plus MS) total 38. Another 28 graduate students received grants for their research. Again this includes

A couple of notes:

The NCST and PSR grants do an annual call for proposals. We were finishing up Year 2 projects as of the termination and had just collected proposals for Year 3 projects. We are reporting the number of researchers for Year 2, as this is a good indicator of the number of researchers we would have had for Year 3. The amount of funding for research projects is the same from year to year.

The total of 72 includes 38 researchers funded with federal funding, plus 34 researchers funded with matching funds from Caltrans that we are no longer guaranteed to get because we no longer have the federal funds. In other words, the Caltrans funds were conditional on the federal funds. We feel it is appropriate to include these researchers as well, but of course we understand if you want to use just the federal numbers. For student grants, we included the funding from our Office of Research that they provided as match that was also conditional on the federal funding.

The spreadsheet with details is attached. This shows the numbers separately for researchers versus students, federal versus state funding, by campus.

I hope this is what you need. Let me know if you'd like to talk it through.

Thanks!

Susan

From: Claudia Polsky <polskymermin@sbcglobal.net>
Sent: Tuesday, September 9, 2025 3:55 PM
To: Susan L Handy <slhandy@ucdavis.edu>
Subject: Re: Q about DOT researchers in UC system impacted by grant terminations

Most important are senate faculty/professional researchers. If there are PhD students involved too, it would be good to have that as a separate figure. thanks!

On Tuesday, September 9, 2025 at 12:16:46 PM PDT, Susan L Handy <slhandy@ucdavis.edu> wrote:

Hi Claudia - We're not sure what to do about students, i.e. GSRs. Should we include them, or should we only include academic senate faculty and professional researchers?

Thanks,

Susan

From: Claudia Polsky <polskymermin@sbcglobal.net>
Sent: Sunday, September 7, 2025 10:27 PM
To: Susan L Handy <slhandy@ucdavis.edu>
Subject: Re: Q about DOT researchers in UC system impacted by grant terminations

Thank you, Susan!

On Sunday, September 7, 2025 at 09:19:58 PM PDT, Susan L Handy <slhandy@ucdavis.edu> wrote:

I'm on it!

From: Claudia Polsky <polskymermin@sbcglobal.net>
Sent: Sunday, September 7, 2025 5:45 PM
To: Susan L Handy <slhandy@ucdavis.edu>
Subject: Q about DOT researchers in UC system impacted by grant terminations

Hi Susan. As we move towards a court hearing on 9/18 about potential DOT grant reinstatements, it would be helpful for us to have firmer figures as to the number of UC researchers systemwide who are directly impacted by unlawful terminations of DOT awards and subawards to date. Your declaration for this litigation, combined with data from UCOP, has provided some of the figures we need. If you are able this week without too much effort able to get us more accurate info on the UC personnel involved as subawardees on the UCS grant below, that would be terrific.

Many thanks,

Claudia

Federal Award No.	Project Title	Prime Awardee	Subawardees	# of UC researchers affected
A24-3016	The Center for Emissions Reduction, Resiliency, and Climate Equity in Transportation (CERRCET)	UC Davis	<ul style="list-style-type: none">University of California, RiversideCalifornia State University, Long BeachTexas Southern UniversityUniversity of Southern CaliforniaUniversity of Vermont	<ul style="list-style-type: none">8 UC researchers total (5 UC Davis, 3 UC Riverside) <p>{Documentation in support:</p> <p>UCD - 24-1853 Proposal_Watkins (UCD award); FE_MCA_A24 (UCR subaward))-> I can supply if needed</p>

69A3552344814	National Center for Sustainable Transportation	UC Davis	<ul style="list-style-type: none"> University of California, Riverside California State University, Long Beach University of Southern California Georgia Institute of Technology University of Vermont 	<ul style="list-style-type: none"> 14 UC researchers total (as per grant award attached to Declaration of Susan Handy)
69A3552348309	Pacific Southwest Region University Transportation Center	University of Southern California	<ul style="list-style-type: none"> University of California, Berkeley University of California, Davis University of California, Irvine University of California, Los Angeles California State University, Long Beach Northern Arizona University Pima Community College University of Hawaii University of Nevada, Las Vegas 	<ul style="list-style-type: none"> 4 UC researchers minimum (1 per subawardee campus); we don't have the full personnel list but could obtain if necessary



US DOT Researchers affected.xlsx
12.1 KB